



Via ECFS

February 6, 2006

Marlene H. Dortch, Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street SW
Washington, D.C. 20554

**RE: WilTel Communications, LLC
Certification of CPNI Filing (February 6, 2006)
EB Docket No. 06-36
EB-06-TC-060**

Dear Ms. Dortch:

Pursuant to the Public Notice issued by the Enforcement Bureau on January 30, 2006¹ and the Commission rules concerning telecommunications carriers' protection of customer proprietary network information, WilTel Communications, LLC submits the attached Certification of CPNI Compliance for filing in the above-referenced dockets.

Respectfully,

/s/ Adam Kupetsky
Adam Kupetsky
Director of Regulatory
Regulatory Counsel

Enclosure

cc: **Byron McKoy** (via email to byron.mccoy@fcc.gov)
Best Copy and Printing (via email to fcc@bcpiweb.com)

¹ *Enforcement Bureau Directs all Telecommunications Carriers to Submit CPNI Compliance Certifications*, WC Docket No. 05-196, Public Notice, DA 06-223 (rel. Jan. 30, 2006).


STATE OF OKLAHOMA)
) ss
COUNTY OF TULSA)

CERTIFICATION OF CPNI COMPLIANCE

That the undersigned does hereby certify the following:

1. I, **Mardi de Verges**, am Treasurer and Senior Vice President of Finance for WilTel Communications, LLC ("WilTel") during the period covered by this Certification of CPNI Compliance. I am authorized to make this certification on behalf of WilTel.
2. I have personal knowledge that WilTel has established operating procedures that adequately ensure WilTel's compliance with Part 64, Subpart U, of the rules of the Federal Communications Commission pertaining to customer proprietary network information ("CPNI"). WilTel's applicable operating procedures are more fully described in the attached Statement, which is incorporated herein by reference.
3. This Certification of CPNI Compliance covers the time period beginning January 1, 2005 and ending December 31, 2005
4. The facts contained in the attached Statement are true and correct to the best of my knowledge, information and belief.

Dated: February 6, 2006



Mardi de Verges
Treasurer and SVP Finance
WilTel Communications, LLC

6th Subscribed and sworn to before me, a notary public in and for said county and state, this day of Feb., 2006.



Notary Public

My Commission Expires:



OPERATING PROCEDURES PERTAINING TO CPNI

WilTel Communications, LLC ("WilTel") is primarily a backbone provider of wholesale telecommunications services, including switched voice, private line, dedicated internet access and long-haul IP services. WilTel does not provide services to individual consumers and only provides retail services to a handful of business enterprise customers. In its capacity as a wholesale provider, WilTel does not receive individually identifiable information from its customers about individual end users (such as names or addresses), with the exception of call routing information contained in the call detail record consisting of the calling party number and the dialed number ("CDR Information") needed to properly route telephone calls over its network. The only other CPNI obtained by WilTel from its customers (both wholesale and enterprise) includes the company name, billing address and a contact person for billing purposes. WilTel uses CPNI solely for the purpose of providing service to the customer, such as for billing, troubleshooting or fraud protection purposes. WilTel does not use CPNI for marketing or related purposes, including marketing for additional WilTel services.

WilTel has operational procedures in place to ensure that any CPNI WilTel obtains is protected from prohibited use, access or disclosure in accordance with the FCC's CPNI rules. Customer CPNI is stored on WilTel's premises within WilTel's own password and firewall protected EMC storage frame, and CPNI is accessible only by WilTel employees with a need for access to such information (such as for billing purposes) or by the customer itself, as authorized and in a format created by WilTel. For four specific enterprise customers only, billing information is also stored in secure databases belonging to WilTel's billing agent, the employees of which only have access on a need-to-know basis to carry out its billing function. Each customer's access to its own CPNI is secure and strictly regulated by WilTel via one of three secure means: FTP internet portal, NDM dedicated line, or CD-rom. With the exceptions described below, WilTel does not disclose, or grant access to, CPNI to any third party. WilTel's network is monitored for evidence of fraudulent or unlawful use or access in an effort to prevent breach.

Access by WilTel Employees

Only WilTel personnel with a need to know such information have access to customer CPNI. When an employee requires access to customer CPNI records, the employee must obtain approval from his/her supervisor as well as from WilTel's Information Security group, which then assigns the employee a username and password. Twice yearly, the Information Security group validates all active usernames to ensure that such users still require access to the CPNI records. On an annual basis, every employee with access to CPNI records will be sent a notice and survey requiring each employee to reaffirm his/her understanding and acknowledgement of CPNI obligations.

WilTel employees are bound by internal codes of conduct and ethics, including WilTel's Disclosure of Nonpublic Information Policy. WilTel employees also execute confidentiality agreements that prohibit them from sharing information, including

passwords to network databases and customer CPNI, with any other person. When an employee transfers out of a position or leaves the company, the employee's passwords are changed/revoked to ensure that future access is not possible. WilTel employees are subject to discipline for any violation of company codes or policies, including the possibility of termination.

Access by Customers:

WilTel will only disclose or share a customer's CPNI with an individual(s) that WilTel knows is an authorized contact person for the customer. WilTel identifies the individual at the time of account set-up at which time the contact information is input into WilTel's systems for billing and other purposes, ensuring that the authorized contact person(s) is known by other WilTel personnel. If WilTel receives requests for access to CPNI from anyone other than its designated contact person(s), and WilTel has not been notified that such person is authorized to gain access to the customer's CPNI, then WilTel will deny the request.

WilTel's customers can access their own CPNI via three secure methods. The most common method is via a secured FTP site on the internet. At the time WilTel sets up the customer's account, WilTel issues a user-name and password to the designated authorized contact person. WilTel encourages the customer to subsequently change the password upon initial access for security purposes. The customer has access to its CPNI only – no other customer CPNI. A customer can request that additional users be granted access to the FTP site, at which time WilTel requires verification that the person has the customer's authorization. WilTel strongly discourages its customers from granting too many individuals access to its CPNI. A customer can also access its CPNI via a secure NDM (network data mover) which is a dedicated line connecting WilTel's secure network to the customer. This is the most secure method of access to CPNI. Finally, a customer can, upon request, obtain its CDR Information on CD-rom. WilTel will mail such information to the known authorized contact person at the customer's contact address.

Access by Third Parties:

With the exceptions described below, WilTel does not disclose, or grant access to, CPNI to any third party. If any third party requests access to or use of a customer's CPNI, WilTel will not grant access unless such access is necessary for network fraud protection purposes or WilTel has received the express written authorization of the customer to do so for the specific party. WilTel requires customer authorization to be in the form of a letter or written notice from an authorized customer representative.

WilTel necessarily protects its network and its customers from fraudulent, abusive, or unlawful use of WilTel's services. WilTel's fraud protection efforts include the use of a third party vendor with whom WilTel has contracted for the purpose of maintaining WilTel's fraud protection system as well as backing up CDR Information for

use in the event of a disaster. Under this contractual relationship, WilTel's vendor is bound by obligations of confidentiality.

WilTel has contracted with a third party billing agent solely for the purpose of billing and collecting for services rendered to four enterprise business customers. WilTel exchanges information with its billing agent in a secure manner, and has taken steps to ensure that the billing agent will adequately protect WilTel's CPNI. CDR Information, used to render invoices, is exchanged with the billing agent via a secured NDM dedicated line. Other CPNI required by the billing agent to render bills for services (customer name, billing address and contact information) is provided to the billing agent via a secure web portal that requires password access. Only a limited number of WilTel employees are granted access and given a unique username and password. The billing agent stores the information in a secure database, and the billing agent's employees also have only limited access to WilTel's customer CPNI as needed to carry out its billing function. WilTel chose its billing agent through an RFI process to ensure, among other things, that the billing agent was reputable and would be able to protect WilTel's data. The billing agent is bound by obligations of confidentiality in its contract with WilTel.